

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS - DALLAS DIVISION**

HOPPENSTEIN PROPERTIES, INC.
Plaintiff,

v.

**CITY OF DALLAS and EDDIE
GARCIA, in his official capacity as
Chief of Police,**
Defendants.

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Civ. Action No.3:21-cv-01172

PLAINTIFF'S DESIGNATION OF EXPERTS

TO: Defendants Eddie Garcia and the City of Dallas, by and through their counsel of record, Kathleen Fones, Plaintiff Hoppenstein Properties, Inc serves this Designation of Experts expected to testify at trial.

Respectfully Submitted,

By: /s/ Warren V. Norred

Warren Norred, Texas Bar No. 24045094

wnorred@norredlaw.com

Norred Law, PLLC

515 E. Border St., Arlington, TX 76010

Tel. (817) 704-3984; Fax. (817) 524-6686

Attorneys for Plaintiff

CERTIFICATE OF SERVICE - I certify that the above was served on all parties seeking service in the instant case via the Court's e-file system on April 1, 2022.

/s/ Warren V. Norred

Warren V. Norred

EXPERTS EXPECTED TO TESTIFY AT TRIAL

Warren Norred, Attorney:

1. Warren Norred; 515 East Border, Arlington, Texas 76010; 817-704-3984
2. Reasonable and necessary attorney fees, litigation expenses, and costs incurred by the Plaintiff in this lawsuit and in rebuttal to any expert designated within his field of expertise. Mr. Norred's mental impressions and opinions are based on his experience practicing law in the DFW area, and his knowledge of rates customarily charged by attorneys for similar services, as well as his knowledge of attorneys' fees charged to Plaintiff in this case. As well as rebuttal testimony to any experts offered by Defendants to prove up attorney's fees that Defendants may seek at trial.
3. \$350-\$425/hour to try this case is necessary and reasonable, based on previous experience as a licensed attorney in Texas, more than ten years of experience with the Texas judicial system, and substantial experience in civil litigation.
4. Expert production
 - A. Invoices will be supplemented. Review of Defendant's attorney invoices will also be required and will be reviewed.
 - B. Warren V. Norred is an attorney with experience in bankruptcy, intellectual property and litigation, including but not limited to foreclosures, trademark and patent infringement and general contract matters. Mr. Norred earned his Bachelor in Electrical Engineering in 1990 from the University of Texas at Arlington. He earned his Master of Science in Electrical Engineering in 1993, and recognized as a licensed Professional Engineer in 1996. Shortly thereafter, Mr. Norred began an engineering firm, which also represents global manufacturers of electronic components, selling them to design organizations in Texas, Oklahoma, Arkansas and Louisiana. Mr. Norred earned his law degree in 2007 from Texas Wesleyan School of Law, now known as Texas A&M University School of Law, where he wrote for the Texas Wesleyan Law Review. Mr. Norred is a member of the State Bar of Texas and numerous local bars. He is licensed to practice before all federal courts in Texas, the United States Patent and Trademark Office, the Fifth Circuit, the Ninth Circuit, and the Federal Circuit Courts of Appeal. Bibliography: Texas Wesleyan Law Review, "Removing Mud in the Clean Water Act: The Ninth Amendment as a Limiting Factor in *Chevron* Analysis," 14 Tex. Wesleyan L. Rev. 51.

Norman Hoppenstein, Owner:

Norman Hoppenstein, Hoppenstein Properties, Inc.; 1131 Rockingham Dr, Richardson, TX 75080; (214) 679-7815

- a. Mr. Hoppenstein will testify on damages and potential damages to his properties and business as a result of the City's regulatory actions.
- b. Mr. Hoppenstein's mental impressions and opinions are based on over XX years of experience as an owner of commercial properties.
- c. Expert production: no report has yet been created.